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July 21, 2020

**ECF and [EngelmayerNYSDChambers@nysd.uscourts.gov](mailto:EngelmayerNYSDChambers@nysd.uscourts.gov)**

Hon. Paul A. Engelmayer  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: United States v. William Knox  
Dkt. No. 15-Cr-445 (PAE)**

Dear Judge Engelmayer:

AUSA Max Nicholas, Probation Adam Pakula, and I have worked diligently to resolve Mr. Knox's violation of supervised release charge. The parties believe that the following joint proposal addresses both Mr. Knox's concern about finding work and the Probation Department's concerns about the difficulties in supervision.

1. Mr. Knox will plead guilty to the single specification – leaving or staying outside of his residence without permission of the Probation Department.
2. Sentencing will be adjourned 90 days.
3. During this 90 day period, Mr. Knox will be removed from location monitoring and the condition that Mr. Knox remain in his residence unless granted permission by the Probation Department will be suspended.
4. If by the end of this 90 day period Mr. Knox is employed or enrolled in school or a training program, the Court will restore Mr. Knox to supervised release and not impose any further punishment.
5. If Mr. Knox has not obtained employment or enrolled in school or a training program by the end of this 90 day period, or commits a crime during this 90 day period, the Court will impose a 4 month sentence and Mr. Knox will continue on supervised release when released from prison.

The parties wish to appear before the Court as soon as possible so that Mr. Knox can

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enter his plea. The parties recognize that the sentencing proposal outlined above is only a recommendation, and that the Court retains full discretion with respect to sentencing.

Please feel free to have your Chambers call me if you have any questions.

Sincerely,

*Lloyd Epstein*  
Lloyd Epstein

LE:pc

cc. AUSA Max Nicholas  
Probation Officer Adam Pakula  
Mr. William Knox  
(All by email)